



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

APR 27 2015

REPLY TO THE ATTENTION OF:

**CERTIFIED MAIL 7009 1680 0000 7677 7872**  
**RETURN RECEIPT REQUESTED**

Mr. Eric Rosenberg  
Operations Manager  
Pioneer Metal Finishing  
13251 Stephens Road  
Warren, Michigan 48089

Re: Request for Information

Pioneer Metal Finishing  
13251 Stephens Road  
Warren, Michigan 48089  
EPA ID: MIR000044644

Pioneer Metal Finishing  
24600 Industrial Highway  
Warren, Michigan 48089  
EPA ID: MID985632975

Dear Mr. Rosenberg:

By this letter, the U. S. Environmental Protection Agency requests information under Section 3007 of the Resource Conservation Act (RCRA), as amended, 42 U.S.C. § 6927. Section 3007 authorizes the Administrator of the U.S. EPA to require you to submit certain information.

This request requires Pioneer Metal Finishing, Inc. (hereinafter "Pioneer," "facility," or "you") to submit certain information relating to Pioneer's waste management procedures. We are requiring this information to determine the facility's compliance status with the provisions of RCRA as delineated in the authorized Michigan Administrative Code (MAC), and the United States Code of Federal Regulations (C.F.R.); specifically, those regulations related to the generation, treatment, and storage of hazardous waste set forth in MAC R. 299.9306 [40 C.F.R. § 262.34(a)]. The enclosure specifies the information you must submit. You must submit this information within 21 calendar days of receiving this request to the U.S. EPA, Attention: Brenda Whitney, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

You may, under 40 C.F.R. Part 2, Subpart B, assert a business confidentiality claim covering all or part of the information in the manner described in 40 C.F.R. § 2.203(b). We will disclose the information covered by a business confidentiality claim only to the extent and by means of the procedures at 40 C.F.R. Part 2, Subpart B. You must make any request for confidentiality when you submit the information, as any information not so identified may be made available to the public without further notice.

Pioneer must submit all requested information under an authorized signature certifying that the information is true and complete to the best of the signatory's knowledge and belief. Should the



signatory find, at any time after submitting the requested information, that any portion of the submitted information is false, misleading or incomplete, the signatory should notify us. Knowingly providing false information, in response to this request, may be actionable under 18 U.S.C. §§ 1001 and 1341. We may use the requested information in an administrative, civil or criminal action.

This request is not subject to the Paperwork Reduction Act, U.S.C. §§ 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

Failure to comply fully with this request for information may subject Pioneer to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928.

You should direct questions about this request for information to Brenda Whitney at (312) 353-4796.

Sincerely,



Julie Morris, Chief  
Compliance Section 2

Enclosure



## REQUEST FOR INFORMATION

**Instructions:** You must respond separately to each of the questions or requests in this attachment. Precede each answer with the number of the Request for Information to which it corresponds. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which it responds.

If information not known or available to Pioneer as of the date of submission of its response should later become known or available to Pioneer, then Pioneer must supplement its response to EPA.

All terms used in this Request for Information shall have their ordinary meaning unless such terms are defined in RCRA, 42 U.S.C. §§ 6901 *et seq.* and its implementing regulations.

The information requested below pertains to EPA compliance evaluation inspections (“CEI”) conducted by Brenda Whitney at two Pioneer facilities located at 13251 Stephens Road (“Pioneer 1”) and 24600 Industrial Highway (“Pioneer 2”) in Warren, Michigan on November 20, 2014.

### Requests:

1. Identify all persons consulted in preparing the answers to this Request for Information. Provide the full name and title for each person identified, business telephone number for each individual identified, and the number of years that each identified individual has worked for or at Pioneer 1 or 2.
2. At the time of the CEI at Pioneer 1, four 55-gallon drums of off-spec material were stored on a pallet adjacent to the facility’s 180-day hazardous waste storage area. During the CEI, Mr. David Corey, Maintenance Manager, stated that these containers were still part of the ongoing insurance claim stemming from a fire that had broken out at Pioneer 1 on June 20, 2014. Provide the following information regarding the material in these drums:
  - a. Provide the generic name of the material in these drums (e.g., adhesive, primer, etc.). Include MSDS forms or other information identifying the contents of these drums.
  - b. Explain what has happened to the material in these drums since the CEI occurred:
    - i. If the materials in the drums were determined to be a waste and were shipped off-site, provide the corresponding shipping manifests.
    - ii. If the material in the drums was re-used on site, provide an explanation of re-use.
    - iii. If the drums are still in storage, state Pioneer’s plans for the materials’ future use or disposal.
3. For the following wastes, provide (1) waste determinations [i.e., hazardous or non-hazardous]; (2) documentation of generator knowledge or of analytical results to support the determinations; (3) bills of lading, invoices, manifests or other documents showing the destination of the following wastes; and (4) an explanation of the end use or method of disposal for each waste (e.g., landfilled, laundered, etc.):
  - a. Sludge removed from the in-ground trenches and settling tank (Pioneer 1);
  - b. Wastewater treatment filter cake (Pioneer 1 and 2); and
  - c. Rags contaminated with solvent (Pioneer 1 and 2).

4. Information provided during the CEI to support non-hazardous waste determinations for overspray filters on the chain-on-edge (COE) units at Pioneer 1 and 2 was insufficient. The primer used in these systems contains, among other things, methyl ethyl ketone (MEK). According to Mr. Corey, the filters are managed as non-hazardous waste after they are left to air dry. The waste determination for this material must be made prior to the filters being dried. Therefore, EPA is requesting Pioneer obtain analytical TCLP and flash point data on a discarded wet (not dried) filter and provide the data and results to EPA in response to this Request for Information.
5. Provide the contract, agreement, or purchase invoice showing that the dust generated from shot/sand blasting is purchased either for continued use or reclamation. (Pioneer 1)
6. Provide records of weekly inspections for the 180-day storage area for the months of October 2014 through December 2014, if available. (Pioneer 1 and 2).
7. Provide final TSDF-signed copies of hazardous waste manifests for the years 2012-2014. (Pioneer 1 and 2). If the number of manifests amounts to more than 20 for both facilities combined, then only provide manifests for the years 2013 and 2014.
8. Provide the name and title of the employee at Pioneer 2 who accompanied Ms. Whitney and Mr. Corey during the CEI.

#### **Certification**

9. Provide the following certification by a responsible corporate officer:

I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.